

These 3 sets of Comments sent to
BA4 on 12/3/04.

**Mineral Springs Comments on
RCRA Facility Assessment Report
Asheville Dyeing and Finishing Facility
Swannanoa, North Carolina
NCD070619663**

EXECUTIVE SUMMARY

Paragraph 3 – *"The entire ADF property comprises approximately 54 acres and includes a 157,613 square foot building that includes office space, a large manufacturing area, a maintenance garage, two loading docks, and a Quality Control laboratory."*

The building is approximately 205,000 square feet in size and the overall acreage should be changed from 54 acres to 65 acres.

Paragraph 5 – *"The only historic unit remaining from Asheville Dyeing and Finishing is the groundwater remediation system that was put in place to treat a spill of perchloroethylene (PCE) that occurred prior to 1985."*

The groundwater remediation systems were installed between 1997 and 2001, subsequent to the Anvil Knitwear purchase. Therefore, the remediation systems were not part of the original Asheville Dyeing and Finishing process. Please delete this statement from the RFA document.

Paragraph 5 – *"After the laboratory approves the fabric, the fabric is wrapped in plastic wrap and packaged to be shipped to customers in Honduras and El Salvador."*

Please delete the words "in Honduras and El Salvador". This wording is not relevant to the context of this report.

Paragraph 6 – *"Based on the PR and information gathered during the BSI, a total of 23 SWMUs and two AOCs were identified at the ADF facility."*

This sentence states that two AOCs were identified at the subject facility. During review of the attached text and table, only one AOC was identified. Please change this sentence to indicate that one AOC was identified.

SECTION 2.1: File Search and Visual Site Inspection

Paragraph 3 – *"The primary facility participants were Steve Pegg, Director of Human Resources for Anvil Knitwear, Bob Laboube, Culligan International, who is the consultant for Asheville Dyeing and Finishing, and Kirk Pollard, Mineral Springs Environmental, who is the previous consultant for Asheville Dyeing and Finishing."*

This sentence should read "The primary facility participants were Steve Pegg, Director of Human Resources for Anvil Knitwear, Bob Laboube, Culligan International, Project Manager for RCRA Remediation Activities for this site, and Kirk Pollard, Mineral Springs Environmental, current consultant for the AD&F facility."

SECTION 4.0: Description of Site Activities and History

Paragraph 2 - *"The process equipment that was owned and operated by Asheville Dyeing and Finishing were reportedly removed when Anvil Knitwear purchased the property."*

Remove the word reportedly.

Paragraph 3 - *"After the fabric is approved by the laboratory, the fabric is wrapped in plastic wrap and packaged to be shipped to customers in Honduras and El Salvador."*

Please remove the words "in Honduras and El Salvador". This wording is not relevant to the context of this report.

SECTION 4.2: Regulatory History

Paragraph 1 - *"The PCE reportedly entered an eight-inch corrugated drain pipe (SWMU 14) located on the Winston Mills, Inc. property that ultimately discharged into Beetree Creek"*

The reference in parenthesis should be changed from (SWMU 14) to (SWMU 13).

Paragraph 8 - *"In 1998-99, United States Filter Corporation became the owner/operator of the site."*

This sentence should be deleted from the text. United States Filter Corporation never owned or operated the site.

SECTION 5.1: Site Location and Setting

Paragraph 1 - *"The entire ADF property comprises approximately 54 acres and includes a 157,613 square foot building that includes office space, a large manufacturing area, a maintenance garage, two loading docks, and a Quality Control laboratory."*

The property comprises approximately 65 acres and the building is approximately 205,000 square feet in size.

SECTION 5.1.2: Topography and Surface Water

Paragraph 1 – *"The immediate area surrounding the facility is relatively flat and slopes east down gradient to Beetree Creek (SWMU 13)."*

Reference is made that Beetree Creek is SWMU 13. This reference should be deleted from the document.

The following information should be added to this section:

- The portion of Beetree Creek which flows adjacent to the AD&F facility and emanates from the Beetree Reservoir is not a part of the drinking water supply for the city of Asheville.
- The Swannanoa River is also not a part of the City of Asheville drinking water supply.

SECTION 6.0: SWMU and AOC Descriptions

Paragraph 1 – *"Based on the PR and information gathered during the VSI, a total of 23 SWMUs and two AOCs were identified at the ADF facility."*

Please change the number of AOCs from two to one.

SECTION 6.10: SWMU 10 – Former Waste PCE Tank Area

Paragraph – Physical Description and Condition

"Located near the southeast corner of the facility building was an underground storage tank that was used to store spent TCE between 1971 and 1985. This tank, along with another UST used to store new TCE, was reportedly removed by the facility in 1985."

These sentences should be changed to reflect that one underground storage tank was used to store spent PCE and that the second tank was used to store virgin PCE. An additional reference to the tank being used for the storage of spent TCE is also included in the section below entitled "Wastes and/or Hazardous Constituents Managed".

SECTION 6.13: SWMU 13 – Eight-inch Drain

Paragraph – Wastes and/or Hazardous Constituents Managed:

"The release entered into an eight-inch corrugated drain pipe (SWMU 14) located on the Winston Mills, Inc. property that ultimately discharged into Beetree Creek."

The drain pipe should be referenced as (SWMU-13).

SECTION 6.14: SWMU 14 – Old Dump Area

Paragraph – Comments:

Please add the following discussion:

It cannot be confirmed using visual observations that hazardous waste or materials were ever placed in the dump area. Sampling activities conducted by the North Carolina Superfund Section and others for soil or groundwater impacts did not reveal the need for additional investigations. In addition, the majority of the material within the dump area appears to consist of concrete blocks, old ductwork, and some empty drums.

"The North Carolina groundwater standards for these priority pollutant metals are 0.005 mg/L for cadmium, 0.05 mg/L for chromium, 1.0 mg/L for copper, 0.015 mg/L for lead, 0.01 mg/L for nickel, and 2.1 mg/L for zinc."

The sentence should be changed to indicate that the groundwater standard for nickel is 0.1 mg/L.

SECTION 6.16: SWMU 16 – Former Drum Storage Area

Paragraph – Wastes and/or Hazardous Constituents Managed:

"The Former Drum Storage Area was used to temporarily store 55-gallon drums containing drill cuttings, development water and purge water generated during the installation of the facility's Sparging/SVE Remediation Systems (SWMU 11)."

The 55-gallon drums were used to store drill cuttings, development water and purge water associated with the installation of monitoring wells MW-16s, MW-16d, MW-17s, MW-17d, and MW-18s, not wells installed as part of the remediation system.

SECTION 6.24: AOC 1 – Former Disturbed Soil Area

Paragraph – Comments:

Monitoring wells have been installed to monitor the groundwater impact in this area. In addition, a groundwater remediation system has been installed to address the groundwater impact associated with this release. Based on the work previously completed, confirmation soil sampling is necessary to determine the lateral extent of impact in the soil within the AOC.

ATTACHMENT 1: Solid Waste Management and Area of Concern List

Confirm that the numbers on the table match the SWMU or AOC numbers used in the text.